

# EXHIBIT M

---

**From:** Bassett, Nicholas <nicholasbassett@paulhastings.com>  
**Sent:** Wednesday, August 28, 2019 6:51 AM  
**To:** Pavel, Ashley  
**Cc:** Mashberg, Gregg M. (Proskauer Rose LLP); Clark, Brandon C.; Jones, Jennifer L.; Stafford, Laura (Proskauer Rose LLP); Dale, Margaret A. (Proskauer Rose LLP); ebarak@proskauer.com; Carino, Elisa M.; Possinger, Paul V. (Proskauer Rose LLP); McKeen, Elizabeth L.; Friedman, Peter; Mitchell, Nancy; Yang, Roger; Roth, Joseph L.; lucdespins@paulhastings.com; Jimenez, Pedro; Bliss, James R.; Worthington, James B.; Zwilling, Zachary S.; Mason, Richard G.; Wolf, Amy R.; Kleinhaus, Emil A.; Celentino, Joseph C.; Lynch, John F.; Fell, Jamie (Simpson Thacher & Bartlett LLP); sarah.phillips@stblaw.com; Friedman, Bryce L. (Simpson Thacher & Bartlett LLP); Baker, Nicolas (Simpson Thacher & Bartlett LLP); Herring, Angela K.; Rolando Emmanuelli Jimenez  
**Subject:** RE: PREPA - Supplemental Discovery Requests

[EXTERNAL MESSAGE]

Ashley,

Following up on the below, please let us know if PREPA has changed its position on whether or not Mr. Ortiz will be made available for deposition. His deposition is all the more appropriate now in light of the fact that PREPA and AAFAF have designated Mr. Batlle as their Rule 30(b)(6) representative on all topics, meaning that not a single government official from either AAFAF or PREPA is slated to testify. Indeed, at present, PREPA and AAFAF are only offering one witness—Mr. Batlle—for deposition. It is plainly not disproportionate to the needs of this dispute for the government to put up two witnesses for deposition, particularly where one of them is an advisor, and we are confident the Court would agree.

We are happy to confer as to the scheduling of the deposition.

If you intend to move for a protective order, please let us know so we can work out a briefing schedule.

Nick



---

**Nick Bassett | Of Counsel**

Paul Hastings LLP | 875 15th Street, N.W., Washington, DC 20005 | Direct: +1.202.551.1902 | Main: +1.202.551.1700 | Fax: +1.202.551.0402 | [nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com) | [www.paulhastings.com](http://www.paulhastings.com)

---

**From:** Pavel, Ashley <apavel@omm.com>  
**Sent:** Tuesday, August 20, 2019 10:40 PM  
**To:** Bassett, Nicholas <nicholasbassett@paulhastings.com>  
**Cc:** Mashberg, Gregg M. (Proskauer Rose LLP) <gmashberg@proskauer.com>; Clark, Brandon C. <BClark@proskauer.com>; Jones, Jennifer L. <jljones@proskauer.com>; Stafford, Laura (Proskauer Rose LLP)

<lstafford@proskauer.com>; Dale, Margaret A. (Proskauer Rose LLP) <mdale@proskauer.com>; ebarak@proskauer.com;  
Carino, Elisa M. <ecarino@proskauer.com>; Possinger, Paul V. (Proskauer Rose LLP) <ppossinger@proskauer.com>;  
McKeen, Elizabeth L. <emckeen@omm.com>; Friedman, Peter <pfriedman@omm.com>; Mitchell, Nancy  
<nmitchell@omm.com>; Yang, Roger <ryang@omm.com>; Roth, Joseph L. <joeroth@omm.com>; Despina, Luc A.  
<lucdespina@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Bliss, James R.  
<jamesbliss@paulhastings.com>; Worthington, James B. <jamesworthington@paulhastings.com>; Zwillinger, Zachary S.  
<zacharyzwillinger@paulhastings.com>; Mason, Richard G. <RGMason@wlrk.com>; Wolf, Amy R. <ARWolf@wlrk.com>;  
Kleinhaus, Emil A. <EAKleinhaus@wlrk.com>; Celentino, Joseph C. <JCCelentino@wlrk.com>; Lynch, John F.  
<JLynch@wlrk.com>; Fell, Jamie (Simpson Thacher & Bartlett LLP) <jamie.fell@stblaw.com>; sarah.phillips@stblaw.com;  
Friedman, Bryce L. (Simpson Thacher & Bartlett LLP) <bfriedman@stblaw.com>; Baker, Nicolas (Simpson Thacher &  
Bartlett LLP) <nbaker@stblaw.com>; Herring, Angela K. <AKHerring@wlrk.com>; Rolando Emmanuelli Jiménez  
<rolando@emmanuelli.law>

**Subject:** [EXT] Re: PREPA - Supplemental Discovery Requests

Counsel:

Pursuant to the parties' agreed-upon scheduling order, amended deposition notices and supplemental document requests were due by July 5, 2019. Dkt. 1366, at 2. The current agreed-upon scheduling order allows for additional deposition notices only for good cause shown or to depose new declarants. Dkt. 1579, at 2 n.2, 3 nn.3-4.

The Committee has not sought relief from the agreed-upon schedule prior to serving either the Fourth Set of Document Requests to FOMB, AAFAF and PREPA or the Second Supplemental 30(b)(6) Notices to PREPA, AAFAF, and the FOMB (collectively, the "Discovery Requests"). Nor has the Committee shown good cause to propound discovery regarding BDO (or any indication for why the Discovery Requests are relevant). Nor has the Committee articulated any reason why the requested discovery into the BDO engagement is relevant to the issues before the court on the 9019 motion. Any materials that could be relevant to the 9019 motion would be captured by the Committee's other requests. The deposition notice to Jose Ortiz is also untimely, nor has the Committee articulated good cause for this deposition.

We would like to meet and confer with you regarding these requests during our call tomorrow.

On Aug 16, 2019, at 2:32 PM, Bassett, Nicholas <[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com)> wrote:

[EXTERNAL MESSAGE]

Counsel:

Please find attached (i) document requests and Rule 30(b)(6) deposition notices directed to the Government Parties concerning work performed by BDO Puerto Rico that may relate to matters at issue in the 9019 Motion, and (ii) a deposition notice directed to Jose Ortiz.

The Committee is serving the BDO Puerto Rico-related discovery at this time in light of the Oversight Board's recent announcement of an investigation into the services provided by BDO Puerto Rico to certain Commonwealth agencies and instrumentalities, including PREPA, and other recent developments.

The Committee is serving the deposition notice upon Jose Ortiz at this time for several reasons, including that (i) he has made numerous recent public statements concerning the RSA and its relationship to the proposed transformation, which the Committee is entitled to explore in a deposition, (ii) PREPA/AAFAF are no longer presenting Christian Sobrino as a witness in support of the 9019 Motion and have yet to designate another government official to testify in his place, and (iii) as a result of Judge Dein's August 2 order, we will be receiving documents from Mr. Ortiz and will likely want to question him about those documents.

We are available to meet and confer as to scheduling and other issues.

Regards,  
Nick



**Nick Bassett | Of Counsel**

Paul Hastings LLP | 875 15th Street, N.W., Washington, DC 20005 | Direct:  
+1.202.551.1902 | Main: +1.202.551.1700 | Fax: +1.202.551.0402 |  
[nicholasbassett@paulhastings.com](mailto:nicholasbassett@paulhastings.com) | [www.paulhastings.com](http://www.paulhastings.com)

<PREPA 9019 -- Second Supp. 30(b)(6) Notice to PREPA.pdf>  
<PREPA 9019 -- Second Supp. 30(b)(6) Notice to AAFAF.pdf>  
<PREPA 9019 -- Fourth Set of Document Requests to FOMB AAFAF PREPA.pdf>  
<PREPA 9019 -- Depo Notice to Jose Ortiz.pdf>  
<PREPA 9019 -- Second Supp 30(b)(6) Notice to FOMB.pdf>  
<mg\_info.txt>

\*\*\*\*\*  
This message is sent by a law firm and may contain information that is privileged or confidential. If you received this transmission in error, please notify the sender by reply e-mail and delete the message and any attachments. If you reply to this message, Paul Hastings may collect personal information including your name, business name and other contact details, and IP address. For more information about Paul Hastings' information collection, privacy and security principles please click [HERE](#). If you have any questions, please contact [Privacy@paulhastings.com](mailto:Privacy@paulhastings.com).